



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

DMP:ICR  
F. #2015R01787

*271 Cadman Plaza East  
Brooklyn, New York 11201*

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By FedEx and ECF

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New York, NY 10036

Re: United States v. Dan Zhong and Landong Wang  
Criminal Docket No. 16-614 (DLI)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-referenced matter, which has been designated "Sensitive Discovery Material" under the terms of the Protective Order dated February 22, 2017 (Dkt. No. 37) (the "February 22 Order"). This disclosure supplements the government's earlier disclosures under cover of letters dated February 15, May 22, May 24, June 12, July 12, July 24, August 30, October 24, December 1, December 8, December 14, December 17, 2017, and December 22, 2017. The government renews its request for reciprocal discovery from the defendant.

Enclosed are records of the United States Department of State, relating to A-2 and G-2 visas issued to employees of China Rilin Construction (Group) Co. Ltd. ("China Rilin"), which have been designated "Sensitive Discovery Material" under the February 22 Order. (DZ063150-DZ066043). Please note that some of the records in this production were previously produced to the defendant under cover of letters dated May 22, 2017 (DZ017170-DZ017889), July 24, 2017 (DZ062213-DZ062812), and December 1, 2017 (DZ062987-DZ063068).

For some of the visa applications originally submitted in hard copy form on behalf of employees of China Rilin more than ten years ago, the government is not in possession of the hard copy visa applications and no electronic copies of the applications

have been made. The government has requested that the Department of State search its archives for the copies of these applications and provide them to the government if they exist. The government will supplement its production of these records to the defendant if and when the Department of State provides the hard copy documents to the government. In lieu of the hard copy applications, the government has produced the records in its possession, which include information taken from the hard copy visa application and entered into Department of State systems in the regular course of business.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney

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Enclosures (DZ063150-DZ066043)

cc: Clerk of the Court (DLI) (by ECF) (without enclosures)